

HOLWELL SHUSTER & GOLDBERG LLP

425 Lexington Avenue, 14th Floor
New York, New York 10017
Tel: (646) 837-5151
Fax: (646) 837-5150
www.hsgllp.com

Avi Israeli
646-837-5157
aisraeli@hsgllp.com

Application Granted



Valerie Figueredo, U.S.M.J.

DATED: November 2, 2023

The parties are directed to submit a revised case management plan by no later than Wednesday, November 22, 2023. The Clerk of Court is directed to terminate the motion at ECF No. 58.

October 31, 2023

VIA ECF

Hon. Valerie Figueredo
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: Edgewood Partners Insurance Center, Inc. d/b/a Edgewood Partners Insurance Agency, as a successor in interest to Integro USA, Inc., v. PPD Development, L.P., 22-cv-06957

Dear Judge Figueredo:

The parties hereby submit this joint letter to request an extension of 21 days within which to submit a revised case management plan, to and including November 21, 2023.

On November 22, 2022, the Court entered an Order staying all discovery deadlines pending the outcome of Defendant's Motion for Summary Judgment and directing the parties to "submit a revised case management plan within one week following entry of a decision on the summary judgment motion." (ECF No. 31). On September 27, 2023, the Court issued an Opinion and Order denying Defendant's Motion as to Count II of Plaintiff's Amended Complaint. (ECF No. 51). On October 24, 2023, the Court issued an Opinion and Order granting Defendant's Motion as to Count I of Plaintiff's Amended Complaint. (ECF No. 55). Per the Court's Order of November 22, 2022, the deadline for the parties to submit a revised case management plan is October 31, 2023.

On November 15, 2022, the Defendant, as part of the parties' Joint 26(f) Report, requested that the Court stay discovery pending resolution of the Defendant's Motion for Summary Judgment. (ECF No. 22). Otherwise, the parties have not previously requested an extension of the deadline to submit a case management plan.

The parties respectfully request an extension of time to submit a revised case management plan to allow for additional time to meet and confer, and craft a proposed discovery schedule that accounts for the scope of the case following the Court's October 24, 2023 Opinion and Order.

HOLWELL SHUSTER & GOLDBERG LLP

All parties consent to this request.

Respectfully submitted,

/s/ Avi Israeli

Avi Israeli

/s/ John E. Bellus, Jr.

John E. Bellus, Jr.

cc: Counsel of record (via ECF)